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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	:	Case No. 2:22-cr-00034-JAD-EJY-1
	:	
Plaintiff,	:	
	:	
v.	:	<u>FIFTH STIPULATION TO</u>
	:	<u>EXTEND PRE-TRIAL MOTION</u>
GEORGE MCHUGH,	:	<u>DEADLINES</u>
	:	
Defendant.	:	

IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United States Attorney, and Jacob Operskalski, Assistant United States Attorney, counsel for the United States of America (hereinafter “the Government”), and Nicholas Wooldridge, Wooldridge Law Ltd., counsel for George McHugh (“the Defendant”) that the pre-trial motions currently ordered to be filed on January 30, 2023 be vacated and extended an additional sixty (60) days, as well as the corresponding oppositions and reply deadlines.

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The Stipulation is entered into for the following reasons:

1. The additional time requested herein is not sought for purposes of delay, but to permit counsel for the defendant to complete his investigation in this case to determine whether pre-trial motions will be necessary.
2. The defendant does not object to the continuance.
3. The parties agree to the continuance.
4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation.
5. Denial of this request for continuance would waste limited judicial resources, and deny counsel for the defendant sufficient time to effectively represent the defendant.
6. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the Fifth Stipulation to continue the motion schedule filed herein.

DATED: January 27, 2023

WOOLDRIDGE LAW, LTD.

JASON FRIERSON
United States Attorney

By /s/ Nicholas M. Wooldridge
NICHOLAS M. WOOLDRIDGE
Counsel for Defendant

By /s/ Jacob H. Operskalski
Jacob H. Operskalski
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	:	Case No. 2:22-cr-00034-JAD-EJY-1
	:	
Plaintiff,	:	
	:	
v.	:	STIPULATION TO
	:	<u>EXTEND PRE-TRIAL</u>
	:	<u>MOTIONS DEADLINE</u>
GEORGE MCHUGH,	:	
	:	
Defendant.	:	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to conduct his investigation in this case in order to determine whether there are any issues that must be litigated and whether pre-trial motions need to be filed.

2. The defendant does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay.

5. Denial of this request for continuance would waste limited judicial resources, and deny counsel for the defendant sufficient time to effectively represent the defendant.

6. Additionally, denial of this request for continuance could result in a miscarriage of justice.

CONCLUSIONS OF LAW

The ends of justice are served by granting said extension.

ORDER

IT IS THEREFORE ORDERED that the pretrial motions deadline is continued to March 30, 2023. Responses are due by April 13, 2023. Replies are due by April 20, 2023.

DATED this 1st day of February, 2023.


UNITES STATES DISTRICT JUDGE